

1 KEKER & VAN NEST LLP  
ROBERT A. VAN NEST - # 84065  
2 rvannest@kvn.com  
CHRISTA M. ANDERSON - # 184325  
3 canderson@kvn.com  
DANIEL PURCELL - # 191424  
4 dpurcell@kvn.com  
633 Battery Street  
5 San Francisco, CA 94111-1809  
Telephone: (415) 391-5400  
6 Facsimile: (415) 397-7188

7 KING & SPALDING LLP  
BRUCE W. BABER (pro hac vice)  
8 bbaber@kslaw.com  
1185 Avenue of the Americas  
9 New York, NY 10036  
Tel: (212) 556-2100  
10 Fax: (212) 556-2222

11 Attorneys for Defendant  
GOOGLE INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,  
16 Plaintiffs,  
17 v.  
18 GOOGLE INC.,  
19 Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF KATE LAZARUS IN  
SUPPORT OF GOOGLE INC.'S  
ADMINISTRATIVE MOTION TO SEAL  
GOOGLE'S PROFFER RE: GNU  
CLASSPATH**

Dept. Courtroom 8, 19<sup>th</sup> Fl.  
Judge: Hon. William Alsup

1 I, Kate Lazarus, declare as follows:

2 I am an associate at the law firm of Kecker & Van Nest LLP, counsel to Google Inc.  
3 (“Google”) in the present case. In accordance with Local Rule 79-5(d)(1)(A) & (e), I submit this  
4 declaration in support of Google’s Administrative Motion to Seal Google’s Proffer re: GNU  
5 Classpath. I have knowledge of the facts set forth herein, and if called to testify as a witness  
6 thereto could do so competently under oath.

7 The following portion of Google’s proffer summarize, quote from, or reproduce portions  
8 of materials that have been designated by Oracle as “CONFIDENTIAL” or “HIGHLY  
9 CONFIDENTIAL – ATTORNEY’S EYES ONLY” under the Stipulated Protective Order in this  
10 case:

- 11 • Page 10, lines 21-24 in column labeled “Description”
- 12 • Page 11, lines 23-28 in column labeled “Description”
- 13 • Page 13, lines 19-23 in column labeled “Description”

14  
15 I declare under penalty of perjury that the foregoing is true and correct and that this  
16 declaration was executed at San Francisco, California on April 30, 2016.

17  
18 By:



19 \_\_\_\_\_  
20 KATE E. LAZARUS